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**Admitted pro hac vice*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

REPUBLICAN NATIONAL COMMITTEE,
NEVADA REPUBLICAN PARTY, and SCOTT
JOHNSTON,

Plaintiffs,

v.

FRANCISCO AGUILAR, *in his official capacity as
Nevada Secretary of State*; LORENA PORTILLO, *in
her official capacity as the Registrar of Voters for Clark
County*; WILLIAM "SCOTT" HOEN, AMY
BURGANS, STACI LINDBERG, and JIM
HINDLE, *in their official capacities as County Clerks*,

Defendants.

No. 2:24-CV-00518

**STIPULATION AND
PROPOSED ORDER TO
EXTEND DEADLINE
TO FILE DISCOVERY
PLAN**

FIRST REQUEST

1 This is the first stipulation for an extension of time to file the stipulated discovery
2 plan and scheduling order. Plaintiffs (the Republican National Committee, Nevada
3 Republican Party, and Scott Johnston) and Defendants (Francisco Aguilar; Lorena
4 Portillo; William “Scott” Hoen; Amy Burgans; Staci Lindberg; and Jim Hindle) stipulate
5 as follows:

6 1. On April 15, 2024, Defendant Francisco Aguilar filed his Motion to
7 Dismiss, Doc. 26. The other defendants joined the motion. *See* Docs. 27, 28, 30, 31, 38.

8 2. The current deadline for the parties to submit a stipulated discovery plan
9 and scheduling order is May 30, 2024. *See* Doc. 26; LR 26-1.

10 3. Over the last several weeks, the parties have been conferring over several
11 scheduling issues, including a possible motion to stay discovery in this case pending the
12 Court’s resolution of the motion to dismiss.

13 4. The parties are nearing agreement on these scheduling issues, and
14 respectfully request an additional two weeks to come to an agreement that they can
15 present to the Court.

16 5. Therefore, the parties have agreed to set June 13, 2024, as the deadline for
17 filing the stipulated discovery plan and scheduling order.

18 6. The parties submit this stipulation in good faith and without any intent to
19 cause undue delay in this case.

1 Dated: May 30, 2024

Respectfully submitted,

2 /s/ Laena St-Jules

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25 /s/ Katherine F. Parks

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9 *Counsel for Amy Burgans*

10 **ORDER**

11 **IT IS SO ORDERED.**

12 _____
13 UNITED STATES DISTRICT JUDGE

14 DATED: _____
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